

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 922

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' SECOND MOTION
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE BY WHICH THE
DEBTORS MAY FILE NOTICES TO REMOVE ACTIONS**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or any responsive pleading to the *Debtors' Second Motion for Entry of an Order Extending the Deadline by Which the Debtors May File Notices to Remove Actions* [Docket No. 922] (the "Motion") filed by the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors") with the United States Bankruptcy Court for the District of Delaware (the "Court") on January 19, 2024.

The undersigned further certifies that they have reviewed the Court's docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion and Hearing filed contemporaneously with the Motion, responses to the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on February 2, 2024 (the "Objection Deadline"). The Debtors therefore respectfully request that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: February 5, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ Morgan L. Patterson

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